

No. 23-414

In the Supreme Court of the United States

DEVON ARCHER,

Petitioner,

v.

UNITED STATES OF AMERICA,

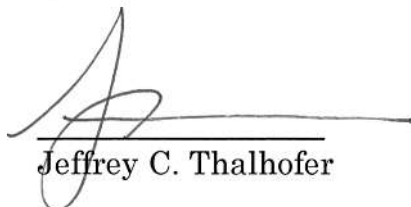
Respondent.

ON PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Rule 33.1(h), I, Jeffrey C. Thalhofer, a member of the Bar of this Court, hereby certify that the Brief of Procedure Scholars as Amici Curiae in Support of Certiorari contains 5,871 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.



Jeffrey C. Thalhofer

November 20, 2023